

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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CLOUDING IP, LLC,

Plaintiff,

v.

VERIZON ONLINE LLC, TERREMARK  
NORTH AMERICA LLC and VERIZON  
BUSINESS NETWORK SERVICES INC.,

Defendants.

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C.A. No. 13-1458-LPS

**REPLY BRIEF IN SUPPORT OF MOTION OF DEFENDANTS  
VERIZON ONLINE LLC, TERREMARK NORTH AMERICA LLC,  
AND VERIZON BUSINESS NETWORK SERVICES INC.  
TO DISMISS FOR LACK OF STANDING**

On December 20, 2013, Defendants Verizon Online LLC, Terremark North America LLC, and Verizon Business Network Services Inc. (collectively, “Verizon Defendants”) moved to dismiss Clouding IP’s complaint for lack of standing. In doing so, the Verizon Defendants incorporated the opening and reply briefs in support of Amazon’s motion to dismiss for lack of standing in *Clouding IP, LLC v. Amazon.com, Inc. et al.*, C.A. No. 12-641-LPS (the “Amazon Case.”), the opening and reply briefs in support of Google and Motorola Mobility’s motion to dismiss for lack of standing on the basis that the purported assignment of patent rights to Clouding IP, LLC is void as champertous in *Clouding IP, LLC v. Google Inc.*, C.A. No. 12-639-LPS (the “Google Case”) and *Clouding IP, LLC v. Motorola Mobility LLC*, C.A. No. 12-1078-LPS (the “Motorola Case”), the opening brief in support of Rackspace’s motion to dismiss for lack of standing filed in *Clouding IP, LLC v. Rackspace Hosting, Inc., et. al*, C.A. No. 12-0675-LPS (the “Rackspace Case”), and the opening brief in support of EMC’s motion to dismiss based upon lack of standing in *Clouding IP, LLC v. EMC*

*Corporation et al.*, C.A. No. 13-01455-LPS (the “EMC Case.”).

To avoid burdening the Court with duplicative briefs, the Verizon Defendants join, rely upon, and incorporate herein the arguments and authority described in the briefs previously incorporated as well as Rackspace’s reply brief in support of its motion to dismiss for lack of standing filed in the Rackspace Case (D.I. 173 in the Rackspace Case) and EMC’s reply brief in support of its motion to dismiss for lack of standing in the EMC Case (D.I. 42 in the EMC Case).

Respectfully submitted,

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Dated: January 15, 2014

**CERTIFICATE OF SERVICE**

I, Benjamin J. Schladweiler, hereby certify that on January 15, 2014, I caused the foregoing ***Reply Brief in Support of Motion of Defendants Verizon Online LLC, Terremark North America LLC, and Verizon Business Network Services Inc. to Dismiss for Lack of Standing*** to be served via electronic mail upon the following individuals:

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